Hearing Date: May 12, 2006 at 10:00 a.m. Objection Deadline: May 5, 2006 at 4:00 p.m.

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK		
IN RE:	x :	CHAPTER 11
DELPHI CORP., et al.	:	BANKRUPTCY NO. 05-44481 (RDD)

Debtors :

## LIMITED OBJECTION

**OF** 

SPS TECHNOLOGIES, LLC A/K/A SPS TECHNOLOGIES-CLEVELAND, NSS TECHNOLOGIES, INC., SPS TECHNOLOGIES WATERFORD COMPANY AND GREER STOP NUT, INC. TO MOTION FOR ORDER UNDER 11 U.S.C. § 365 AND FED. R. BANKR. P. 6006 AUTHORIZING REJECTION OF CERTAIN EXECUTORY CONTRACTS WITH GENERAL MOTORS CORPORATION

AND NOW COME, SPS TECHNOLOGIES, LLC A/K/A SPS TECHNOLOGIES - CLEVELAND, NSS TECHNOLOGIES, INC., SPS TECHNOLOGIES WATERFORD COMPANY AND GREER STOP NUT, INC. (collectively, "SPS"), by and through their counsel and represent as follows:

- 1. DELPHI CORPORATION and 38 affiliates (collectively "Delphi") commenced Chapter 11 bankruptcy cases on October 8, 2005 ("Petition Date").
- 2. SPS was a provider of parts to Delphi prior to the Petition Date. For certain parts SPS was a sole supplier.
- 3. As of the Petition Date, Delphi was indebted to SPS in the amount of not less than \$1,100,000.00. This amount is the aggregate total of the estimated outstanding accounts due from the debtors to SPS.
- 4. SPS supplies parts to Delphi pursuant to numerous purchase orders ("PO's"). Included in the SPS-Debtor PO's are parts which are ultimately sold to General Motors Corporation ("GM").
  - 5. Debtor has filed a Motion for Order Under 11 U.S.C. § 365 and Fed. R. Bankr. P.

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seeking to reject certain purchase orders and/or contracts with GM. The Motion contained a chart

which references the parts by GM part number ("GM Parts Motion").

6. Despite its best efforts, SPS has not been able to cross reference the GM part

numbers to Delphi part number to SPS part number. As a result, SPS has not been able to determine

if SPS would be affected by the relief requested by the Debtor in the GM Parts Motion.

7. SPS has written to Delphi requesting information to cross reference the GM part

numbers to the Debtor and SPS' parts numbers. Delphi is in the process of responding to this

request.

8 Until SPS has had an opportunity to determine if SPS is affected at all by the relief

requested in the GM Parts Motion, the Court should take no action in respect to the GM Parts

Motion.

9. SPS reserves all rights to object to the relief requested in the GM Parts Motion.

Wherefore, SPS requests that the Court not consider the relief requested in the GM Parts

Motion until Delphi provides the cross referencing information to SPS and SPS has had an

opportunity to review the information and make a determination whether the GM Parts Motion

affects SPS, does not affect SPS, or if SPS should take any position at all.

Respectfully submitted,

By: /s/ Robert Szwajkos

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